

Before the  
**COPYRIGHT ROYALTY JUDGES**  
The Library of Congress

*In re*

**DISTRIBUTION OF CABLE  
ROYALTY FUNDS**

**DISTRIBUTION OF SATELLITE  
ROYALTY FUNDS**

**CONSOLIDATED DOCKET NO.  
14-CRB-0010-CD/SD  
(2010-13)**

**SETTLING DEVOTIONAL CLAIMANTS' MOTION TO DE-DESIGNATE  
RESTRICTED MATERIALS (De-Designated)**

Pursuant to the Judges' Protective Orders (Mar. 31, 2016) at §V.D,<sup>1</sup> the Settling Devotional Claimants move for a determination that the following information designated as "Restricted" in Multigroup Claimants' Response to Order to Show Cause (Feb. 28, 2020) should not remain "Restricted":

- Exhibit F, which appears to be an instrument transferring Denise Vernon's interest in Worldwide Subsidy Group, LLC to Alfred Galaz, "[e]ffective January 1, 2017," for consideration of one dollar (attached hereto as Ex. 1);
- Exhibit G, which appears to be an instrument transferring ownership of Worldwide Subsidy Group from Alfred Galaz and Ruth Galaz to Ryan Galaz "[e]ffective December 31, 2017," for consideration of one dollar (attached hereto as Ex. 2);
- Exhibit H, which appears to be an instrument transferring Alfred Galaz's "right, title and interest" in Multigroup Claimants and Spanish Language Producers to

<sup>1</sup> The Judges entered substantially identical protective orders in Nos. 14-CRB-0010-CD and 14-CRB-0011-SD on March 31, 2016. The two cases were subsequently consolidated. Order Consolidating Proceedings and Reinstating Case Schedule (Dec. 22, 2017). Because the substantive provisions are identical, this motion refers to both orders together as one.

[REDACTED]

Ryan Galaz “[e]ffective January 1, 2018,” for consideration of one dollar

(attached hereto as Ex. 3); and

- All portions of Multigroup Claimants’ Response to Order to Show Cause and the supporting Declaration of Brian Boydston that refer to the information contained in Exhibits F, G, and H.

As required by Protective Order § V.D(2), counsel for the SDC served Multigroup Claimants’ counsel with written notice by email that the SDC objected to the designation of the documents as “Restricted,” and requested Multigroup Claimants to withdraw the designation. *See* Ex. 7. Counsel for Multigroup Claimants refused. *Id.*

**I. Multigroup Claimants and Worldwide Subsidy Group Have No Legitimate Interest in Keeping the Identities of Their Owners Confidential.**

There is nothing even arguably confidential about Exhibit F, purporting to show a transfer of Denise Vernon’s interest in Worldwide Subsidy Group, LLC to Alfred Galaz, “[e]ffective January 1, 2017,” for consideration of one dollar. It has already been revealed in multiple public pleadings by Worldwide Subsidy Group and Multigroup Claimants that Denise Vernon was at one time the majority owner of Worldwide Subsidy Group. Alfred Galaz submitted a public declaration claiming that he obtained a 99% interest in Worldwide Subsidy Group at some time before January 1, 2018. *See* Alfred Galaz Declaration in Support of Multigroup Claimants’ Opposition to Settling Devotional Claimants’ Motion for Order to Show Cause (Jan. 9, 2020). The only new information contained in Exhibit F is that the “[e]ffective date” of the transfer is purported to be on January 1, 2017, and the transfer was for one dollar in consideration.

Even if the transfer of Denise Vernon’s interests in Worldwide Subsidy Group to Alfred Galaz had not already been disclosed publicly, Worldwide Subsidy Group has no legitimate

[REDACTED]

expectation that it may keep the identity of its members confidential. As a Texas limited liability company, Worldwide Subsidy Group was required by Tex. Tax Code § 171.203 to file a public information report annually. The public information report form requires identification of the “[n]ame, title and mailing address of each ... *member* ...” of the limited liability company. *See* Ex. 4, Declaration of Eva-Marie Nye, at Exs. A, B, and C (emphasis added). The signature line requires the signer to declare that the information contained on the form is “true and correct to the best of my knowledge and belief, as of the date below ....” *Id.* Each of the reports filed by Worldwide Subsidy Group in 2016, 2017, and 2018, is signed in the name of either Denise Vernon or Alfred Galaz (even though Alfred Galaz denies ever seeing or signing the form). *Id.* The public information reports filed by Worldwide Subsidy Group contradict the information contained in Exhibit F and G (more on this below). But the requirement to file the public information report demonstrates that Worldwide Subsidy Group has no legitimate interest in keeping the identity of its members confidential.

Exhibit G appears to be an instrument transferring ownership of Worldwide Subsidy Group from Alfred Galaz and Ruth Galaz to Ryan Galaz “[e]ffective December 31, 2017,” for consideration of one dollar.

Pleadings filed by Ryan Galaz in litigation against his own mother show that Ryan Galaz is the son of Raul Galaz and Raul Galaz’s ex-wife, Lisa Katona Fodera (previously Lisa Katona Galaz). Ex. 5, Declaration of Ryan T. Galaz in Support of RTG LLC’s Opposition to Lisa Fodera’s Motion for Partial Summary Judgment, *RTG, LLC v. Fodera*, No. 5:19-cv-87-JKP-RBF (W.D. Tex. Oct. 2, 2019), at ¶¶ 2, 7, and 8. Ryan Galaz has been a major recipient of Worldwide Subsidy Group’s largesse. On January 27, 2017, shortly after the purported conveyance of Worldwide Subsidy Group to Alfred Galaz, Worldwide Subsidy Group conveyed a

[REDACTED]

condominium in Miami Beach, Florida, valued at \$363,066.00, to Ryan Galaz's company, RTG, LLC, for no consideration. Ex. 6, Quit Claim Deed from Worldwide Subsidy Group, LLC, to RTG, LLC.

Alfred Galaz has already publicly disclosed that he conveyed his interest in Worldwide Subsidy Group on January 1, 2018 (one day off from the "effective" date of December 31, 2017), although he claimed in his bankruptcy petition that the conveyance was to his ex-wife, Ruth Galaz:

18. Within 2 years before you filed for bankruptcy, did you sell, trade, or otherwise transfer any property to anyone, other than property transferred in the ordinary course of your business or financial affairs? Include both outright transfers and transfers made as security (such as the granting of a security interest or mortgage on your property). Do not include gifts and transfers that you have already listed on this statement.

☐ No

☒ Yes. Fill in the details.

Person Who Received Transfer Address	Description and value of property transferred	Describe any property or payments received or debts paid in exchange	Date transfer was made
Person's relationship to you <b>Ruth Galaz</b>  <b>Ex-wife</b>	<b>Worldwide Subsidy, business that was transferred to ex-wife in January of 2018. Business was inactive, \$0 FMV. Collected royalties from TV programs and copyrights.</b>	<b>None</b>	<b>1/1/2018</b>
<b>Kelli Carpenter 1616 S Fir Ave Broken Arrow, OK 74012</b>	<b>Attorney services for daughter during lengthy divorce and custody battle, total fees to date are \$17,000</b>	<b>\$17,000</b>	<b>In installments from January 2018 to date</b>

So, the only new information contained in Exhibit G is that the transferee of Alfred Galaz's interests in Worldwide Subsidy Group was Ryan Galaz, and not Ruth Galaz.

There is no reason why Ryan Galaz's identity in Exhibit G should be confidential. As with Exhibit F, above, Worldwide Subsidy Group was required to disclose its members in its public information report (notwithstanding the fact that Worldwide Subsidy Group's public information report for 2018, apparently signed by Alfred Galaz as "Member" on June 23, 2018, does not identify Ryan Galaz).



[REDACTED]

Moreover, according to footnote 1 of Multigroup Claimants' Response to Order to Show Cause, "Alfred Galaz provided his bankruptcy legal counsel all of his relevant papers, including the document attached hereto as Exhibit G. Alfred Galaz speculated that such legal counsel simply misread the document, and identified Ruth Galaz, a co-signatory to the document, as the transferee, not Ryan Galaz." According to this footnote, Ryan Galaz would have been publicly identified in Alfred Galaz's bankruptcy petition as the transferee of Worldwide Subsidy Group but for the fact that Alfred Galaz's counsel "misread" the document. Again, there is no legitimate expectation that either the owner or the date of transfer of Worldwide Subsidy Group would be kept confidential.

Exhibit H similarly appears to be an instrument transferring Alfred Galaz's "right, title and interest" in Multigroup Claimants and Spanish Language Producers to Ryan Galaz "[e]ffective January 1, 2018," for consideration of one dollar. The document falsely states that Multigroup Claimants has "no current financial obligations, and no current value," even though Multigroup Claimants claimed to have obligations as an agent for many dozens of copyright claimants, and was currently claiming a right to recover millions of dollars in royalties in multiple Copyright Royalty Board proceedings. Under Massachusetts law, where Ryan Galaz resides, a person conducting business under an assumed name is required to file a certificate publicly in the city or town where the person does business. *See* Mass. Gen. Law ch. 110 § 5:

Any person conducting business in the commonwealth under any title other than the real name of the person conducting the business, whether individually or as a partnership, shall file in the office of the clerk of every city or town where an office of any such person or partnership may be situated a certificate stating the full name and residence of each person conducting such business, the place, including street and number, where, and the title under which, it is conducted, and pay the fee as provided by clause (20) of section thirty-four of chapter two hundred and sixty-two.

[REDACTED]

Copyright Royalty Board regulations likewise require claimants to provide the Board with legal names, and to notify the Board of any change in the legal name or the entity entitled to royalties. 37 C.F.R. § 360.4(c) (“In the event the legal name and/or address of the copyright owner entitled to royalties or the person or entity filing the claim changes after the filing of the claim, the filer or the copyright owner shall notify the Copyright Royalty Board of the change.”). If **Ryan Galaz** is the owner of the assets previously associated with Multigroup Claimants, as Exhibit H appears to show, then there is no legitimate expectation that Multigroup Claimants can keep **Ryan Galaz’s identity** a secret.

## **II. The Public Has a Legitimate Interest in Knowing That an Agent in Copyright Royalty Proceedings Has Submitted False Information.**

Copyright royalty proceedings are presumed to be open to the public, and the burden is on the party seeking protection to show why the documents should be kept Restricted. *See EEOC v. Nat’l Children’s Ctr.*, 98 F.3d 1406, 1409 (D.C. Cir. 1996) (“[T]he starting point in considering a motion to [un]seal court records is a ‘strong presumption in favor of public access to judicial proceedings.’” (quoting *Johnson v. Greater Southeast Community Hosp. Corp.*, 951 F.2d 1268, 1277 (D.C. Cir. 1991))); *see also* 37 C.F.R. § 302.1(a) (“Records of proceedings before the Board will be available for public inspection ....”). The SDC, too, have a right to public proceedings. Perhaps most importantly, the claimants purportedly represented by Multigroup Claimants have the right to access information about who is claiming to be their agent and to act in their interests.

The D.C. Circuit applies a six-part test to determine whether the party seeking to seal records has overcome the “strong presumption” in favor of public access:

- (1) the need for public access to the documents at issue; (2) the extent of previous public access to the documents; (3) the fact that someone has objected to disclosure, and the identity of that person; (4) the strength of

[REDACTED]

any property and privacy interests asserted; (5) the possibility of prejudice to those opposing disclosure; and (6) the purposes for which the documents were introduced during the judicial proceedings.

*EEOC v. Nat'l Children's Ctr.*, 98 F.3d at 1409 (citing *United States v. Hubbard*, 650 F.2d 293, 317–22 (D.C. Cir. 1980)). Application of the *Hubbard* principles is mandatory under circuit precedent. *Johnson v. Greater Southeast Community Hosp. Corp.*, 951 F.2d 1268, 1277 (D.C. Cir. 1991). The burden is on the party seeking to keep records under seal “to come forward with specific reasons why the record, or any part thereof, should remain under seal. Should the court determine that some kind of sealing order is warranted, that order should be no broader than is necessary to protect those specific interests identified as in need of protection.” *Id.* at 1278. In this case, each of the six *Hubbard* factors favor public disclosure:

(1) *Need for Public Access.* There is a need for the public to be aware of the identity and potential fraudulent conduct of agents of copyright owners claiming the right to millions of dollars of copyright royalties collected by an agency of the federal government. Indeed, the fact that the documents bear directly on the administration of funds by a government agency and on the decisions of the Judges is a strong factor in favor of public disclosure. “The appropriateness of making court files accessible is accentuated in cases where the government is a party.” *EEOC v. Nat'l Children's Ctr.*, 98 F.3d at 1409 (quoting *Federal Trade Comm'n v. Standard Fin. Management Corp.*, 830 F.2d 404, 410 (1st Cir. 1987)). The public has a right to know who claims and receives the benefit of large distributions of funds collected by the government, and how the Judges reach their determinations as to who may claim and receive such funds.

(2) *Extent of Previous Public Access.* Much of the information contained in the documents is already contained in other documents that are already made public. Public

[REDACTED]

disclosure of the members of Worldwide Subsidy Group and the owner of “Multigroup Claimants” is required by applicable state law, and is not protected from disclosure by law.

(3) *Identity of the Person Objecting to Disclosure.* Although a party has objected to disclosure, there is absolutely no showing in support of the conclusory declaration from Multigroup Claimants’ counsel that the disclosure of any of this information “could damage Multigroup Claimants and its principals” other than in the obvious respect that they might help to expose numerous false statements by Multigroup Claimants and its principals. *See* Declaration of Brian Boydston (Feb. 28, 2020) at ¶ 2. Indeed, without the information contained in the documents, the “identity of that person” who is objecting to disclosure, which is at the very heart of the Judges’ Order to Show Cause, will remain obscured to the public.

(4) *Property or Privacy Interest in Information.* Multigroup Claimants has articulated no property or privacy interest in the information, which has not been asserted to be a trade secret. The identity of parties doing business before federal government agencies is not a private matter.

(5) *Possibility of Prejudice.* Multigroup Claimants has articulated no possibility of undue prejudice from disclosure of the information, alleging only in general terms that disclosure of the information “could damage Multigroup Claimants and its principals.” This does not meet the burden “to show specific reasons why the record, or any part thereof, should remain under seal.” *Johnson*, 951 F.2d at 1278.

(6) *Purposes for Which the Information Was Introduced.* The documents were introduced in response to the Judges Order to Show Cause, which related specifically to the Judges’ finding that “the current record in this proceeding lacks clarity regarding the identity and ownership of the entity that calls itself Multigroup Claimants.” The documents directly conflict with many of the assertions that Multigroup Claimants has already made to the Judges in

[REDACTED]

connection with the Order to Show Cause and with information that Worldwide Subsidy Group has made public. Keeping Multigroup Claimants' evidence secret will continue to cause a lack of clarity in the public record, further obscuring Multigroup Claimants' true identity.

The public interest in public disclosure of each of these documents is especially clear. The information in each of the exhibits directly conflicts with other information that Worldwide Subsidy Group or Alfred Galaz has made public:

- Exhibit F, purporting to show a transfer of Worldwide Subsidy Group “[e]ffective January 1, 2017,” from Denise Vernon to Alfred Galaz conflicts directly with Worldwide Subsidy Group’s public information report for 2017, apparently signed by Denise Vernon on September 11, 2017, identifying Denise Vernon as Worldwide Subsidy Group’s sole member. (*See* Ex. 4, Declaration of Eva-Marie Nye, at Ex. B).
- Exhibit G, purporting to show a transfer of Worldwide Subsidy Group “[e]ffective December 31, 2017,” from Alfred Galaz and Ruth Galaz to Ryan Galaz conflicts with Worldwide Subsidy Group’s public information report for 2017, discussed above, and with Worldwide Subsidy Group’s public information report for 2018, apparently signed by Alfred Galaz on June 23, 2018, identifying Alfred Galaz and Ruth Galaz each as a “Partner” in Worldwide Subsidy Group. *See* Ex. 4, Declaration of Eva-Marie Nye, at Ex. C). As noted, Exhibit G also conflicts with Alfred Galaz’s public bankruptcy filing, in which he claims that he transferred “Worldwide Subsidy” to Ruth Galaz on January 1, 2018.
- Exhibit H, purporting to show a transfer of Multigroup Claimants and Spanish Language Producers “[e]ffective January 1, 2018,” from Alfred Galaz to Ryan Galaz conflicts with Alfred Galaz’s declaration, filed with Multigroup Claimants’ opposition on January 9,

[REDACTED]

2020, in which Alfred Galaz claimed, “even if I had been required to identify ‘Multigroup Claimants’ in my bankruptcy petition, I had already transferred all interests held by it into Worldwide Subsidy Group, LLC, which adopted ‘Multigroup Claimants’ as an assumed name. At the time of such transfer, I owned 99% of Worldwide Subsidy Group, LLC, and effective January 1, 2018 transferred all of my interest in that entity.” Contrary to Alfred Galaz's public testimony, Exhibit H purports to show that Alfred Galaz transferred Multigroup Claimants to Ryan Galaz, not to Worldwide Subsidy Group, and that he transferred Multigroup Claimants after he had already transferred his 99% interest in Worldwide Subsidy Group.

Multigroup Claimants, Worldwide Subsidy Group, and the Galaz family cannot permissibly use the Judges’ Protective Order to create one narrative in public (whether true or false) while advancing a different and contradictory narrative in restricted filings (whether true or false). The documents concerning transfers of interests in Worldwide Subsidy Group and Multigroup Claimants should be publicly available, and may the truth eventually prevail.

### **III. Conclusion**

For the foregoing reasons, the SDC request the Judges to determine that the documents and information designated as Restricted in Multigroup Claimants’ Response to Order to Show Cause should not remain Restricted.

[REDACTED]

Date: March 4, 2019

Respectfully submitted,

/s/ Matthew J. MacLean

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*Counsel for Settling Devotional Claimants*



**Certificate of Service**

I certify that on March 4, 2019, I caused the foregoing to be served on all parties by filing through the eCRB system.

/s/ Matthew J. MacLean  
Matthew J. MacLean



**Before the  
COPYRIGHT ROYALTY JUDGES  
The Library of Congress**

*In re*

**DISTRIBUTION OF CABLE  
ROYALTY FUNDS**

**DISTRIBUTION OF SATELLITE  
ROYALTY FUNDS**

**CONSOLIDATED DOCKET NO.  
14-CRB-0010-CD/SD  
(2010-13)**

**DECLARATION OF MATTHEW J. MACLEAN IN SUPPORT OF SETTLING  
DEVOTIONAL CLAIMANTS' MOTION TO DE-DESIGNATE RESTRICTED  
MATERIALS**

I, Matthew J. MacLean, hereby state and declare as follows:

1. I am a litigation partner in the law firm Pillsbury Winthrop Shaw Pittman LLP. I represent the Settling Devotional Claimants ("SDC") in this matter.
2. Attached hereto as Exhibit 1 is a true and correct copy of Exhibit F to Multigroup Claimants' Response to Order to Show Cause (Feb. 28, 2020), which Multigroup Claimants' counsel has designated as Restricted Subject to the Protective Order in this matter.
3. Attached hereto as Exhibit 2 is a true and correct copy of Exhibit G to Multigroup Claimants' Response to Order to Show Cause (Feb. 28, 2020), which Multigroup Claimants' counsel has designated as Restricted Subject to the Protective Order in this matter.
4. Attached hereto as Exhibit 3 is a true and correct copy of Exhibit H to Multigroup Claimants' Response to Order to Show Cause (Feb. 28, 2020), which Multigroup Claimants' counsel has designated as Restricted Subject to the Protective Order in this matter.
5. Attached hereto as Exhibit 4 is a true and correct copy of a declaration of Ms. Eva-Marie Nye, the Director of Research Services for my firm, previously submitted with the SDC's Reply

in Support of Motion for Order to Show Cause Why Multigroup Claimants Should Not Be Disqualified as an Agent to Receive Funds on Behalf of Claimants, filed on January 21, 2020.

6. Attached as Exhibit 5 is a true and correct copy of a declaration of Ryan Galaz dated October 2, 2019, that I retrieved from the online public docket of *RTG v. Lisa Katona Fodera*, No. 5:19-cv-00087-JKP-RBF (W.D. Tex.).

7. Attached as Exhibit 6 is a true and correct copy of a Quit Claim Deed from Worldwide Subsidy Group, LLC, to RTG, LLC, dated January 27, 2017, of a condominium in Miami Beach, Florida, valued at \$362,066.00, that I retrieved from the online land records of Miami-Dade County, Florida.

8. Attached hereto as Exhibit 7 is a true and correct copy of an email exchange between me and Multigroup Claimants' counsel on March 2-3, 2020, in which I objected in writing to Multigroup Claimants' designation of the information at issue in this motion as Restricted.

9. Exhibits 1, 2, 3, and 7, and the highlighted portions of pages 1-5 and 8-10 of the SDC's Motion to De-Designate Restricted Materials are submitted as Restricted – Subject to Protective Orders in Docket No. 14-CRB-0010-CD/SD (2010-13) solely because they contain information that has been designated as Restricted by Multigroup Claimants.

I hereby declare under penalty of perjury that the foregoing is true and correct. Executed March 4, 2020, in Washington, DC.

/s/ Matthew J. MacLean  
Matthew J. MacLean

**EXHIBIT 1**

**Exhibit F to Multigroup Claimants' Response to Order to Show Cause**



[REDACTED]

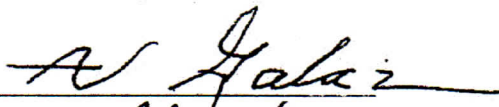
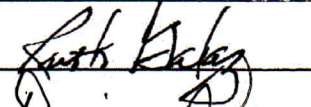
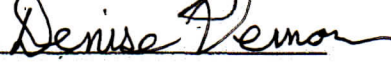
TRANSFER OF OWNERSHIP INTERESTS  
IN  
WORLDWIDE SUBSIDY GROUP,LLC,  
dba INDEPENDENT PRODUCERS GROUP

Effective January 1<sup>st</sup>, 2017, for and in consideration of the sum of one dollar and good and other valuable consideration, hereby agree that Denise Vernon, a member and economic interest holder in Worldwide Subsidy Group, LLC (WSG), a Texas limited liability company, sometimes doing business as Independent Producers Group, hereby transfers and assigns to Al Galaz all of her right, title and interest in WSG, including but not limited to any interest as a member or economic interest holder in WSG.

WSG's members its agents, employees, officers, consultants, directors, successors and assigns shall indemnify and hold harmless Denise Vernon from and against any and all damages, liabilities, losses, expenses, taxes, costs or claims (including attorneys' fees). The term "claims" mean any claim or right or demand to assert or recover money for a debt or for actual or exemplary damages or for any restitution, statutory or regulatory penalty, or any other remedy providing for recovery of money.

WSG and the aforementioned releases and discharges Denise Vernon from any claim that they have asserted now or in the future against Denise Vernon based on any act, omission, condition or event for which they allege or could allege that Denise Vernon is or was responsible in any way from the beginning of time through the date of this agreement. This release includes all such claims regardless of whether WSG knows of the claim now or not, and regardless of whether they know of the circumstances giving rise to the claim or not. It is intended for this to be the broadest and most comprehensive release of claims allowed by law and intends that in any dispute over the meaning or scope, it be interpreted liberally in favor of Denise Vernon to effect that intent. The releasing parties promise to never sue Denise Vernon on (or otherwise assert against Denise Vernon) any claim subject to this release.

This agreement and transfer is approved by all members of the limited liability company in accordance with the articles of organization and the regulations of the company.

Al Galaz   
Ruth Galaz   
Denise Vernon 

**EXHIBIT 2**

**Exhibit G to Multigroup Claimants' Response to Order to Show Cause**

[REDACTED]

**TRANSFER OF OWNERSHIP INTERESTS IN  
WORLDWIDE SUBSIDY GROUP, LLC  
dba INDEPENDENT PRODUCERS GROUP**

Effective December 31, 2017, for and in consideration of the sum of one dollar and good and valuable consideration, we hereby agree that AL GALAZ and RUTH GALAZ, members and economic interest holders in Worldwide Subsidy Group, LLC (WSG), a Texas limited liability company, sometimes doing business as Independent Producers Group, hereby transfer and assign to RYAN GALAZ all of their right, title and interest in WSG, including but not limited to any interest as member or economic interest holders in WSG.

AL GALAZ and RUTH GALAZ, their agents, employees, officers, consultants, directors, successors and assigns, shall indemnify and hold harmless RYAN GALAZ from and against any and all damages, liabilities, losses, expenses, taxes, costs or claims (including attorneys' fees). The term "claims" means any claim or right or demand to assert or recover money for a debt or for actual or exemplary damages or for any restitution, statutory or regulatory penalty, or any other remedy providing for recovery of money. Such right remains exclusive to RYAN GALAZ, and any attempt to transfer such right to a third party shall be deemed null and void *ab initio*.

This agreement and transfer is approved by all members of WSG in accordance with the articles of organization and the regulations of the company.

Al Galaz *Al Galaz* 12/31/17

Ruth Galaz *Ruth Galaz* 12/31/17

Ryan Galaz *Ryan Galaz* 12/31/17

**EXHIBIT 3**

**Exhibit H to Multigroup Claimants' Response to Order to Show Cause**





**TRANSFER OF OWNERSHIP INTERESTS  
IN MULTIGROUP CLAIMANTS AND  
SPANISH LANGUAGE PRODUCERS**

Effective January 1, 2018, for and in consideration of the sum of one dollar and such other good and valuable consideration, we hereby agree that AL GALAZ, owner of all interests in MULTIGROUP CLAIMANTS and SPANISH LANGUAGE PRODUCERS, sole proprietorships, hereby transfers and assigns to RYAN GALAZ all of his right, title and interest thereto, including but not limited to any interest as a legal or economic interest holder, and any interest in executory contracts to which such entities are a party or beneficiary.

AL GALAZ hereby represents that MULTIGROUP CLAIMANTS and SPANISH LANGUAGE PRODUCERS have no current financial obligations, and no current value. In the event such representation is subsequently established to be inaccurate, AL GALAZ, his agents employees, officers, consultants, directors, successors and assigns, shall indemnify and hold harmless RYAN GALAZ from and against any and all damages, liabilities, losses, expenses, taxes, costs or claims (including attorneys' fees) as a result thereof. The term "claims" means any claim or right or demand to assert or recover money for a debt or for actual or exemplary damages or for any restitution, statutory or regulatory penalty, or any other remedy providing for recovery of money. Such right remains exclusive to RYAN GALAZ, and any attempt to transfer such right to a third party shall be deemed null and void *ab initio*.

This agreement and transfer is approved by all owners or interest holders in MULTIGROUP CLAIMANTS and SPANISH LANGUAGE PRODUCERS.

Al Galaz *Al Galaz* 1/01/2018

Ryan Galaz *Ryan Galaz* 1/1/2018



**EXHIBIT 4**

**Declaration of Ms. Eva-Marie Nye**

**Before the  
COPYRIGHT ROYALTY JUDGES  
The Library of Congress**

*In re*

**DISTRIBUTION OF CABLE  
ROYALTY FUNDS**

**DISTRIBUTION OF SATELLITE  
ROYALTY FUNDS**

**CONSOLIDATED DOCKET NO.  
14-CRB-0010-CD/SD  
(2010-13)**

**DECLARATION OF EVA-MARIE NYE IN SUPPORT OF SETTling DEVOTIONAL  
CLAIMANTS' REPLY IN SUPPORT OF MOTION FOR ORDER TO SHOW CAUSE  
WHY MULTIGROUP CLAIMANTS SHOULD NOT BE DISQUALIFIED AS AN  
AGENT TO RECEIVE FUNDS ON BEHALF OF CLAIMANTS**

I, Eva-Marie Nye, hereby state and declare as follows:

1. I am the Director of Research Services for the law firm Pillsbury Winthrop Shaw Pittman LLP.
2. In my prior declaration, I testified that "[t]he Public Information Report for the Texas company [Worldwide Subsidy Group LLC] shows that it is an active company and that its 'partners' are Alfred Galaz and Ruth Galaz. Alfred Galaz appears to have signed the most recent filing, dated June 23, 2018."
3. I have reviewed Alfred Galaz's Declaration in Support of Multigroup Claimants' Opposition to Settling Devotional Claimants Motion for Order to Show Cause in which he testifies:

Contrary to the assertion of the SDC, my signature does not appear on such document [the Public Information Report], nor the 'signature' of any person. Moreover, I was never an owner of Worldwide Subsidy Group, LLC during 2018. In fact, I had never previously seen such document, was not aware of such document, and am confident that no member of Worldwide Subsidy Group, LLC prepared or filed such document.

4. I have also reviewed Multigroup Claimants' Opposition to Settling Devotional Claimants Motion for Order to Show Cause, in which Multigroup Claimants states:

WSG can only speculate regarding how such document came into existence (presumably the product of some automatic filing), but is continuing to investigate.

5. Attached hereto as Exhibits A, B, and C, respectively, are Worldwide Subsidy Group, LLC's three most recent Public Information Reports for 2016, 2017, and 2018, available online through the website of the Texas Comptroller of Public Accounts. No Public Information Report appears for 2019.

6. Each form is clearly marked with a notice to **"Please sign below! This report must be signed to satisfy tax requirements."** At the bottom of each form, there is a box requiring the signatory to **"sign here,"** beneath a box that states: "I declare that the information in this document and any attachments is true and correct to the best of my knowledge and belief, as of the date below, and that a copy of this report has been mailed to each person named in this report who is an officer, director, general partner or manager and who is not currently employed by this or a related corporation, LLC, LP, PA or financial institution."


7. I have examined the Public Information Report form that is available for filers to download and fill out. There is no option to populate the signature box of the form automatically.

8. Each of the Public Information Reports for 2016 and 2017 lists Denise Vernon as a "Member" and Brian Boydston in an unstated capacity. The Public Information Report for 2016 contains a typewritten signature that reads "DENISE G VER DENISE G VERNON" dated September 13, 2016. The Public Information Report for 2017 contains a handwritten signature that appears to read "Denise Vernon" dated September 11, 2017.

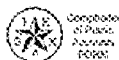
9. The Public Information Report for 2018 contains information that differs from the two previous filings, listing Alfred Galaz and Ruth Galaz, each with the title of “Partner.” The Public Information Report for 2018 contains a typewritten signature that reads “Alfred Galaz,” with the title of “Member,” dated June 23, 2018. No other Public Information Report online for Worldwide Subsidy Group, LLC lists Alfred Galaz as a partner or member, or contains Alfred Galaz’s signature.

10. A page attached to the Public Information Report for 2018 appears to show that it was transmitted by ProSeries, a brand of desktop tax preparation software hosted by Intuit, Inc., the same company that owns other well-known desktop accounting applications like Quickbooks and TurboTax.

I hereby declare under penalty of perjury that the foregoing is true and correct. Executed January 14, 2020, in Washington, District of Columbia.

  
Eva-Marie Nye

# **EXHIBIT A**

05-102  
(Rev. 9-15/33)**Texas Franchise Tax Public Information Report**To be filed by Corporations, Limited Liability Companies (LLC), Limited Partnerships (LP),  
Professional Associations (PA) and Financial Institutions

■ Ycode 13196 Franchise

■ Taxpayer number

■ Report year

1 7 4 2 9 1 4 3 7 0 8

2 0 1 6

You have certain rights under Chapter 552 and 559,  
Government Code, to review, request and correct information  
we have on file about you. Contact us at 1-800-252-1381.

Taxpayer name <b>WORLDWIDE SUBSIDY GROUP LLC</b>		<input checked="" type="checkbox"/> Blacken circle if the mailing address has changed.	
Mailing address <b>132 PERRY CT</b>		Secretary of State (SOS) file number or Comptroller file number	
City <b>SAN ANTONIO</b>	State <b>TX</b>	ZIP code plus 4 <b>78209</b>	<b>0704877122</b>

☐ Blacken circle if there are currently no changes from previous year; if no information is displayed, complete the applicable information in Sections A, B and C.

Principal office <b>132 PERRY CT, SAN ANTONIO, TX, 78209</b>
Principal place of business <b>132 PERRY CT, SAN ANTONIO, TX, 78209</b>

You must report officer, director, member, general partner and manager information as of the date you complete this report.



100000000015

*Please sign below!***This report must be signed to satisfy franchise tax requirements.****SECTION A** Name, title and mailing address of each officer, director, member, general partner or manager.

Name <b>DENISE VERNON</b>	Title <b>MEMBER</b>	Director <input type="checkbox"/> YES	Term expiration m m d d y y <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
Mailing address <b>PO BOX 1357</b>	City <b>HELOTES</b>	State <b>TX</b>	ZIP Code <b>78023</b>
Name <b>BRIAN BOYDSTON</b>	Title	Director <input type="checkbox"/> YES	Term expiration m m d d y y <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
Mailing address <b>1000 WILSHIRE BLVD 600</b>	City <b>LOS ANGELES</b>	State <b>CA</b>	ZIP Code <b>90017</b>
Name	Title	Director <input type="checkbox"/> YES	Term expiration m m d d y y <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
Mailing address	City	State	ZIP Code

**SECTION B** Enter information for each corporation, LLC, LP, PA or financial institution, if any, in which this entity owns an interest of 10 percent or more.

Name of owned (subsidiary) corporation, LLC, LP, PA or financial institution <b>NONE</b>	State of formation	Texas SOS file number, if any	Percentage of ownership
Name of owned (subsidiary) corporation, LLC, LP, PA or financial institution	State of formation	Texas SOS file number, if any	Percentage of ownership

**SECTION C** Enter information for each corporation, LLC, LP, PA or financial institution, if any, that owns an interest of 10 percent or more in this entity.

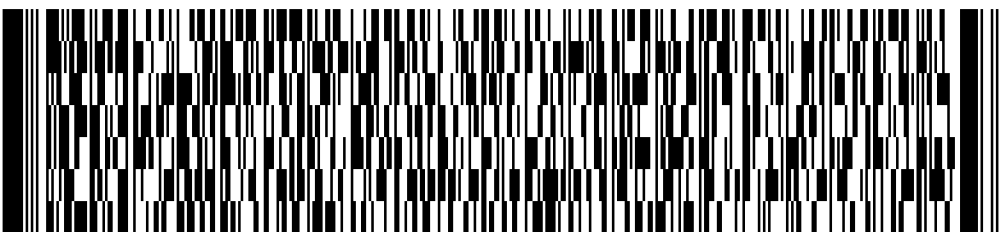
Name of owned (parent) corporation, LLC, LP, PA or financial institution <b>NONE</b>	State of formation	Texas SOS file number, if any	Percentage of ownership
---	--------------------	-------------------------------	-------------------------

Registered agent and registered office currently on file (see instructions if you need to make changes)		You must make a filing with the Secretary of State to change registered agent, registered office or general partner information.	
Agent:			
Office:	City	State	ZIP Code

The information on this form is required by Section 171.203 of the Tax Code for each corporation, LLC, LP, PA or financial institution that files a Texas Franchise Tax Report. Use additional sheets for Sections A, B and C, if necessary. The information will be available for public inspection.

I declare that the information in this document and any attachments is true and correct to the best of my knowledge and belief, as of the date below, and that a copy of this report has been mailed to each person named in this report who is an officer, director, member, general partner or manager and who is not currently employed by this or a related corporation, LLC, LP, PA or financial institution.

sign here <b>DENISE G VER DENISE G VERNON</b>	Title <b>MEMBER</b>	Date <b>09/13/2016</b>	Area code and phone number ( ) -
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**Texas Comptroller Official Use Only**

VE/DE	<input type="checkbox"/>	PIR IND	<input type="checkbox"/>
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**Declaration of Eva-Marie Nye**  
**SDC Reply in Support of Motion for Order to Show Cause**

# **EXHIBIT B**

TX 2017 05-102  
Ver. 8.0 (Rev.9-15/33)

**Texas Franchise Tax Public Information Report**  
*To be filed by Corporations, Limited Liability Companies (LLC), Limited Partnerships (LP), Professional Associations (PA) and Financial Institutions*

■ Tcode 13196

■ Taxpayer number <b>742914370</b>		■ Report year <b>2017</b>		<i>You have certain rights under Chapter 552 and 559, Government Code, to review, request and correct information we have on file about you. Contact us at 1-800-252-1381.</i>	
Taxpayer name <b>WORLDWIDE SUBSIDY GROUP LLC</b>				<input type="checkbox"/> Check box if the mailing address has changed.	
Mailing address <b>132 PERRY CT</b>				Secretary of State (SOS) file number or Comptroller file number	
City <b>SAN ANTONIO</b>		State <b>TX</b>		ZIP code plus 4 <b>78209</b>	
				<b>0704877122</b>	

☐ Check box if there are currently no changes from previous year; if no information is displayed, complete the applicable information in Sections A, B and C.

Principal office <b>132 PERRY CT</b>	<b>SAN ANTONIO</b>	<b>TX 78209</b>
Principal place of business <b>132 PERRY CT</b>	<b>SAN ANTONIO</b>	<b>TX 78209</b>

You must report officer, director, member, general partner and manager information as of the date you complete this report.



**Please sign below!** This report must be signed to satisfy franchise tax requirements. **0742914370017**

**SECTION A** Name, title and mailing address of each officer, director, member, general partner or manager.

Name <b>DENISE VERNON</b>	Title <b>MEMBER</b>	Director <input type="checkbox"/> YES	Term expiration m m d d y y
Mailing address <b>PO BOX 1357</b>	City <b>HELOTES</b>	State <b>TX</b>	ZIP Code <b>78023</b>
Name <b>BRIAN BOYDSTON</b>	Title	Director <input type="checkbox"/> YES	Term expiration m m d d y y
Mailing address <b>1000 WILSHIRE BLVD #600</b>	City <b>LOS ANGELES</b>	State <b>CA</b>	ZIP Code <b>90017</b>
Name	Title	Director <input type="checkbox"/> YES	Term expiration m m d d y y
Mailing address	City	State	ZIP Code

**SECTION B** Enter information for each corporation, LLC, LP, PA or financial institution, if any, in which this entity owns an interest of 10 percent or more.

Name of owned (subsidiary) corporation, LLC, LP, PA or financial institution <b>NONE</b>	State of formation	Texas SOS file number, if any	Percentage of ownership
Name of owned (subsidiary) corporation, LLC, LP, PA or financial institution	State of formation	Texas SOS file number, if any	Percentage of ownership

**SECTION C** Enter information for each corporation, LLC, LP, PA or financial institution, if any, that owns an interest of 10 percent or more in this entity.

Name of owned (parent) corporation, LLC, LP, PA or financial institution <b>NONE</b>	State of formation	Texas SOS file number, if any	Percentage of ownership
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Registered agent and registered office currently on file (see instructions if you need to make changes)			
Agent:			
Office:	City	State	ZIP Code

The information on this form is required by Section 171.203 of the Tax Code for each corporation, LLC, LP, PA or financial institution that files a Texas Franchise Tax Report. Use additional sheets for Sections A, B and C, if necessary. The information will be available for public inspection.

I declare that the information in this document and any attachments is true and correct to the best of my knowledge and belief, as of the date below, and that a copy of this report has been mailed to each person named in this report who is an officer, director, member, general partner or manager and who is not currently employed by this or a related corporation, LLC, LP, PA or financial institution.			
sign here ▶ <i>Denise Vernon</i>	Title <i>Member</i>	Date <b>09/11/2017</b>	Area code and phone number <b>210-294-4232</b>

**Texas Comptroller Official Use Only**



VE/DE	<input type="checkbox"/>	PIR IND	<input type="checkbox"/>
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# **EXHIBIT C**

05-102  
(Rev.9-15/33)

## Texas Franchise Tax Public Information Report

To be filed by Corporations, Limited Liability Companies (LLC), Limited Partnerships (LP),  
Professional Associations (PA) and Financial Institutions

■ Tcode 13196 Franchise

■ Taxpayer number

1 7 4 2 9 1 4 3 7 0 8

■ Report year

2 0 1 8

You have certain rights under Chapter 552 and 559,  
Government Code, to review, request and correct information  
we have on file about you. Contact us at 1-800-252-1381.

Taxpayer name <b>Worldwide Subsidy Group LLC</b>		<input checked="" type="checkbox"/> Blacken circle if the mailing address has changed.	
Mailing address <b>132 Perry Court</b>		Secretary of State (SOS) file number or Comptroller file number <b>0704877122</b>	
City <b>San Antonio</b>	State <b>TX</b>	ZIP code plus 4 <b>78209</b>	

● Blacken circle if there are currently no changes from previous year; if no information is displayed, complete the applicable information in Sections A, B and C.

Principal office <b>132 Perry Court, San Antonio, TX, 78209</b>
Principal place of business <b>132 Perry Court, San Antonio, TX, 78209</b>

You must report officer, director, member, general partner and manager information as of the date you complete this report.



1000000000015

**Please sign below!**

This report must be signed to satisfy franchise tax requirements.

## SECTION A Name, title and mailing address of each officer, director, member, general partner or manager.

Name <b>Alfred Galaz</b>	Title <b>Partner</b>	Director <input checked="" type="radio"/> YES	Term expiration <b>1 2 3 1 1 8</b>
Mailing address <b>3901 West Vandalia St</b>	City <b>Broken Arrow</b>	State <b>OK</b>	ZIP Code <b>74012</b>
Name <b>Ruth Galaz</b>	Title <b>Partner</b>	Director <input checked="" type="radio"/> YES	Term expiration <b>1 2 3 1 1 8</b>
Mailing address <b>132 Perry Court</b>	City <b>San Antonio</b>	State <b>TX</b>	ZIP Code <b>78209</b>
Name	Title	Director <input type="radio"/> YES	Term expiration <b>m m d d y y</b>
Mailing address	City	State	ZIP Code

## SECTION B Enter information for each corporation, LLC, LP, PA or financial institution, if any, in which this entity owns an interest of 10 percent or more.

Name of owned (subsidiary) corporation, LLC, LP, PA or financial institution <b>None</b>	State of formation	Texas SOS file number, if any	Percentage of ownership
Name of owned (subsidiary) corporation, LLC, LP, PA or financial institution	State of formation	Texas SOS file number, if any	Percentage of ownership

## SECTION C Enter information for each corporation, LLC, LP, PA or financial institution, if any, that owns an interest of 10 percent or more in this entity.

Name of owned (parent) corporation, LLC, LP, PA or financial institution <b>None</b>	State of formation	Texas SOS file number, if any	Percentage of ownership
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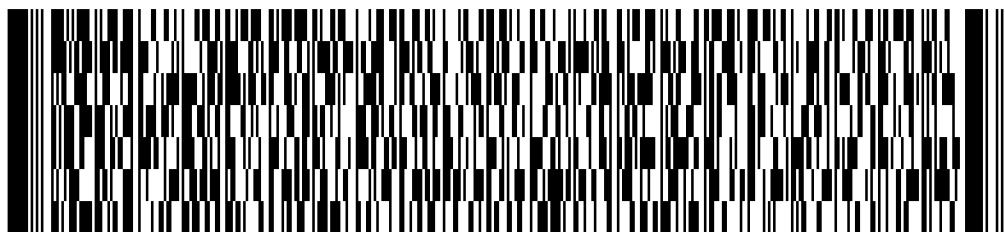
Registered agent and registered office currently on file (see instructions if you need to make changes)		You must make a filing with the Secretary of State to change registered agent, registered office or general partner information.	
Agent: <b>Ruth Galaz</b>			
Office: <b>132 Perry Court</b>	City: <b>San Antonio</b>	State: <b>TX</b>	ZIP Code: <b>78209</b>

The information on this form is required by Section 171.203 of the Tax Code for each corporation, LLC, LP, PA or financial institution that files a Texas Franchise Tax Report. Use additional sheets for Sections A, B and C, if necessary. The information will be available for public inspection.

I declare that the information in this document and any attachments is true and correct to the best of my knowledge and belief, as of the date below, and that a copy of this report has been mailed to each person named in this report who is an officer, director, member, general partner or manager and who is not currently employed by this or a related corporation, LLC, LP, PA or financial institution.

sign here <b>Alfred Galaz</b>	Title <b>Member</b>	Date <b>06/23/2018</b>	Area code and phone number <b>( 210 ) 789 - 9084</b>
-------------------------------	------------------------	---------------------------	---

## Texas Comptroller Official Use Only



VE/DE	<input type="radio"/>	PIR IND	<input type="radio"/>
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Declaration of Eva-Marie Nye  
SDC Reply in Support of Motion for Order to Show Cause

TRANSMITTER ID = PROSERIES

TLN = 00041908709

**EXHIBIT 5**

**Declaration of Ryan Galaz**  
***RTG v. Fodera*, No. 5:19-cv-00087-JKP-RBF (W.D. Tex.)**

VILLA & WHITE, LLP  
Morris E. “Trey” White III (Texas Bar No. 24003162)  
1100 NW Loop 410 #802  
San Antonio, Texas 78213  
Tel: (210) 225-4500  
Fax: (210) 212-4649

Attorneys for Plaintiff RTG, LLC

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

RTG, LLC, a Florida Limited	)	
Liability Company,	)	CASE NO. 5:19-CV-87-DAE
	)	
Plaintiff,	)	
	)	<b>DECLARATION OF RYAN</b>
	)	<b>T. GALAZ IN SUPPORT OF</b>
v.	)	<b>RTG LLC’S OPPOSITION</b>
	)	<b>TO LISA FODERA’S</b>
	)	<b>MOTION FOR PARTIAL</b>
	)	<b>SUMMARY JUDGMENT</b>
	)	
LISA KATONA FODERA, an	)	
individual,	)	
	)	
Defendant.	)	
_____	)	

## **DECLARATION OF RYAN T. GALAZ**

I, RYAN TAYLOR GALAZ, declare and state as follows:

1. I am the sole principal of RTG, LLC, the plaintiff in this action. I submit this declaration in support of Plaintiff RTG, LLC's Opposition to Lisa Fodera's Motion for Partial Summary Judgment. The following facts are within my personal knowledge, and if called upon I could and would testify competently thereto.

2. In September 2016, I discussed with Alfred Galaz, my grandfather, a transfer of a claim he held against Julian Jackson for monies/expenses that had been unrightfully distributed to Jackson by a court-appointed receiver (the "Jackson Claim"). After a brief discussion, we agreed that I would pay \$5,000 to acquire the unrealized, speculative claim against Mr. Jackson. This transaction was confirmed by an email dated September 29, 2019. A few days later, on October 3, 2016, I transferred \$5,000 to Alfred Galaz. These facts are corroborated by correspondence and documents submitted as exhibits. **Exhibits Q, R to Opposition.**

3. I placed ownership of the Jackson Claim into RTG, LLC, a limited liability company wholly owned by me. I then engaged legal counsel in Los Angeles, California (Pick & Boydston LLP), who was already familiar with the matter, and agreed to handle the matter for RTG, LLC. Ultimately, Pick &

Boydston LLP was paid \$13,000 for its services. I filed suit against Mr. Jackson on March 23, 2017. Despite being served, Jackson failed to file a formal response, and on October 23, 2017, a default judgment was entered for \$64,235.

4. I was wholly unaware of any specifics of the litigation between my grandfather and my mother, other than what applied specifically to the Jackson Claim. I testified as to such fact in my deposition, noting that the document references within my prove-up declaration were provided to me by my legal counsel.

5. In sum, RTG, LLC paid more than \$23,000 ( $\$5,000 + \$13,000 + \$5,000$ ) to obtain its 50% interest in the Music Rights, previously held by Jackson.

6. RTG, LLC is owned exclusively by me, and has been since inception. I organized RTG, LLC. I am the only person with access or control to RTG's bank account. I am the only person who maintains the books and records of RTG. I am the only person who has ever filed tax returns on behalf of RTG, and the only person who benefitted financially from RTG. RTG has engaged in three businesses thusfar, the acquisition of a monetary claim against Julian Jackson, the acquisition of music rights, and most significantly, the renovation of residential real estate. The acquisition and renovation of real estate dwarfs the monetary value of the first two businesses by almost ten to one.

7. By contrast, Raul Galaz, my father, had no involvement in “setting up” RTG, as Lisa Fodera maintains. RTG has never entered into any agreement with Raul Galaz. Raul Galaz has never received *any* payment or compensation from RTG, despite RTG having substantial income. Raul Galaz had no participation in RTG’s filing of a lawsuit against Jackson other than generally explaining the legal process to me. Raul Galaz had zero involvement in the sale of Jackson’s assets, including any acquisition of Jackson’s music rights. The *entire* involvement of Raul Galaz in any of RTG’s business was to periodically assist with the renovation of a duplex, and report to me when I could not deal with a matter firsthand.

8. Until being accused by Lisa Fodera, my mother, I was wholly unaware of any injunction that existed in litigation between my grandfather and my mother, much less Fodera’s characterization thereof. In fact, I never even spoke to Alfred Galaz, my grandfather, regarding the injunction or other rulings.

9. Until this lawsuit, I had no knowledge that Fodera held any asserted interest in the Jackson Claim. On behalf of myself and RTG, I believed Alfred Galaz had full authority to transfer the Jackson Claim and, by all appearances, he was not mistaken.



I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 2nd day of October, 2019, at Cambridge, Massachusetts.

  
\_\_\_\_\_  
Ryan T. Galaz

**EXHIBIT 6**

**Quit Claim Deed From Worldwide Subsidy Group. LLC to RTG, LLC (Jan. 27, 2017)**

CFN: 20170066797 BOOK 30409 PAGE 2246  
 DATE: 02/03/2017 11:22:26 AM  
 DEED DOC 2,172.60  
 HARVEY RUVIN, CLERK OF COURT, MIA-DADE CTY

Prepared by and return to:

Eric J. Grabois, Esq.  
 Eric J. Grabois, P.L.  
 1666 79<sup>th</sup> Street Cswy., Ste. 500  
 North Bay Village, FL 33141  
 305-891-2029  
 File Number:  
 Will Call No.:

[Space Above This Line For Recording Data]

**\*\*THIS IS THE CONVEYANCE OF UNENCUMBERED REAL PROPERTY CURRENTLY VALUED AT \$362,066.00. ACCORDINGLY, DOCUMENTARY STAMP TAXES IN THE AMOUNT OF \$2,172.40 ARE BEING PAID.\*\***

## Quit Claim Deed

**This Quit Claim Deed** made this 27 day of January, 2017 between **Worldwide Subsidy Group, LLC, a Texas limited liability company** whose post office address is **132 Perry Ct., San Antonio, Texas 78209**, grantor, and **RTG, LLC, a Florida limited liability company**, whose post office address is **2421 Lake Pancoast Dr., Unit 6A, Miami Beach, FL 33140**, grantee:

(Whenever used herein the terms "grantor" and "grantee" include all the parties to this instrument and the heirs, legal representatives, and assigns of individuals, and the successors and assigns of corporations, trusts and trustees)

**Witnesseth**, that said grantor, for and in consideration of the sum TEN AND NO/100 DOLLARS (\$10.00) and other good and valuable consideration to said grantor in hand paid by said grantee, the receipt whereof is hereby acknowledged, does hereby remise, release, and quitclaim to the said grantee, and grantee's heirs and assigns forever, all the right, title, interest, claim and demand which grantor has in and to the following described land, situate, lying and being in **Miami-Dade County, Florida** to-wit:

**Unit 6A, Helen Mar Condominium, according to the Declaration of Condominium thereof, as recorded in Official Records Book 13459, Page 2570, of the Public Records of Miami-Dade County, Florida.**

**Property Address: 2421 Lake Pancoast Drive, Unit 6A, Miami Beach, FL 33140**

**Parcel Identification Number: 0232270240060**

**To Have and to Hold**, the same together with all and singular the appurtenances thereto belonging or in anywise appertaining, and all the estate, right, title, interest, lien, equity and claim whatsoever of grantors, either in law or equity, for the use, benefit and profit of the said grantee forever.

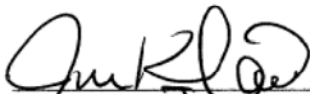
**In Witness Whereof**, grantor has hereunto set grantor's hand and seal the day and year first above written.

DoubleTime®

CFN: 20170066797 BOOK 30409 PAGE 2247

Signed, sealed and delivered in our presence:

Worldwide Subsidy Group, LLC,  
a Texas limited liability company

  
Witness Name: James Klimet

By:   
Ruth Galaz, Authorized Member

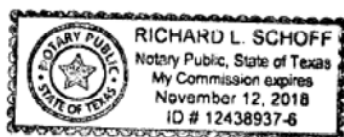
  
Witness Name: Richard L. Schoff

State of Texas  
County of Bexar

The foregoing instrument was acknowledged before me this 27 day of January, 2017 by Ruth Galaz, Authorized Member of Worldwide Subsidy Group, LLC, a Texas limited liability company. She ☐ is personally known or ☒ has produced a driver's license as identification.

[Notary Seal]

  
Notary Public



Printed Name: Richard L. Schoff

My Commission Expires: Nov 12, 2018

CFN: 20170066797 BOOK 30409 PAGE 2248

The Helen Mar Condominium Association, Inc.  
 2421-2445 Lake Pancoast Drive  
 Miami Beach, Florida 33140

CERTIFICATE OF APPROVAL

THIS IS CERTIFY THAT RTG, LLC has been approved by The Helen Mar Condominium Association, Inc. as the buyer(s) of the following described property in Dade County:

CONDOMINIUM UNIT NO: Unit 6A of The Helen Mar Condominium according to the Declaration of Condominium thereof. Recorded in Official Records Book 13459 at page 2570 of the Public Records of Dade County, Florida.

Such approval has been given pursuant to the provisions of the Declaration of Condominium of The Helen Mar Condominium and the right of first refusal has been duly released or waived by the Association and its members and as a result the right of first refusal of the Association has terminated.

ASSESSMENT CERTIFICATION

The Association does hereby certify that all assessments, charges and penalties including interest levied against Condominium Unit No. 6A are paid in full through January 31, 2017.

Dated this day, January 30, 2017

The Helen Mar Condominium Association, Inc.

By: Saul Gross, Asst Sec  
 Saul Gross  
 Title: Assistant Secretary

The monthly maintenance assessment for the above unit is \$594.34.

STATE OF FLORIDA COUNTY OF DADE Before me appeared Saul Gross, personally known to me, or who produced the following identification \_\_\_\_\_, and known to me to be the individual described in and who executed the foregoing instrument as Assistant Secretary of the above named corporation, and has acknowledged before me that said instrument is the free act and deed of said corporation and that the seal affixed thereto by due and regular corporate authority.

Witness my hand and official seal this 30<sup>th</sup> day of January, 2017



Notary Public Johanne H. Moss crop

My commission expires: 9/15/2017

**EXHIBIT 7**

**Email Exchange Between M. MacLean and B. Boydston (Mar. 2-3, 2020)**

[REDACTED]

## MacLean, Matthew J.

---

**From:** MacLean, Matthew J.  
**Sent:** Tuesday, March 3, 2020 4:39 PM  
**To:** Brian D. Boydston, Esq.; jstewart@crowell.com; lhp@msk.com; victor.cosentino@larsongaston.com; john@beiterlaw.com; rdove@cov.com; ritchie.thomas@squirepb.com  
**Cc:** 'Arnold Lutzker'; Ben Sternberg; Nyman, Jessica T.; Warley, Michael A.  
**Subject:** RE: Multigroup Claimants Response to OSC

Brian,

The filing of the public information report is required by Tex. Tax Code § 171.203. The form on its face requires identification of the “[n]ame, title and mailing address of each ... member ...” of the LLC. The signature line requires the signer to declare that the information contained on the form is “true and correct to the best of my knowledge and belief, as of the date below ....” Each of the reports is signed in the name of either Denise Vernon or Alfred Galaz (even though Alfred Galaz denies ever seeing or signing the form). So, yes, the disclosure on the public information reports is required by Texas law, as is the declaration by an authorized person. Likewise, federal bankruptcy law required Alfred Galaz to disclose the identity of the recipient of the business interests that he conveyed.

But you’re missing my point, which is that the publicly filed information – required or not – directly contradicts the information that you have submitted under seal. Your argument seems to be that the publicly filed information is inaccurate, and that you have no obligation to make the ostensibly accurate information public. Is it really necessary for me to file a motion to point out the flaw in this argument to the Judges?

Matt

**Matthew J. MacLean | Partner**

Pillsbury Winthrop Shaw Pittman LLP

1200 Seventeenth Street NW | Washington, DC 20036-3006

t +1.202.663.8183

matthew.macleane@pillsburylaw.com | website bio

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**From:** Brian D. Boydston, Esq. <brianb@ix.netcom.com>  
**Sent:** Tuesday, March 3, 2020 2:51 PM  
**To:** MacLean, Matthew J. <matthew.macleane@pillsburylaw.com>; jstewart@crowell.com; lhp@msk.com; victor.cosentino@larsongaston.com; john@beiterlaw.com; rdove@cov.com; ritchie.thomas@squirepb.com  
**Cc:** 'Arnold Lutzker' <arnie@lutzker.com>; Ben Sternberg <Ben@lutzker.com>; Nyman, Jessica T. <jessica.nyman@pillsburylaw.com>; Warley, Michael A. <michael.warley@pillsburylaw.com>  
**Subject:** RE: Multigroup Claimants Response to OSC

Matt, your statement about Texas law and the filing of Public Information Reports is simply incorrect and, as I'm sure you have seen, even my name errantly appears on several of those filings. Most of these filings do not identify all of the current members, despite multiple other public proceedings wherein those owners are identified for WSG.

If you look into this further, you will see that these are pro forma filings whose purpose is merely to inform the Texas Franchise Tax Board that an entity is still active.

As far as your umpteenth allegation of fraud, this time allegedly perpetuated through the use of a assumed business name, the argument simply does not make sense. You are arguing that the use of Independent Producers Group, Multigroup Claimants, or Spanish Language Producers obscures what information exactly? We have already cited Texas law on the matter (the jurisdiction WSG and each of the assumed business names have been used), but you seem to ignore it.

In fact, there is no requirement in Texas that all of the members be identified, as is the case in most jurisdictions, no more than a corporation is obligated to affirmatively identify all of its owners. Ownership of WSG, a family-owned business, is a private matter, not a public matter, and your assertion of a nefarious purpose based on an incorrect interpretation of Texas law does not warrant our withdrawal of the Restricted clarification.

Brian

-----Original Message-----

From: "MacLean, Matthew J."

Sent: Mar 2, 2020 5:08 PM

To: "Brian D. Boydston, Esq." , "[jstewart@crowell.com](mailto:jstewart@crowell.com)" , "[lh@msk.com](mailto:lh@msk.com)" , "[victor.cosentino@larsongaston.com](mailto:victor.cosentino@larsongaston.com)" , "[john@beiterlaw.com](mailto:john@beiterlaw.com)" , "[rdove@cov.com](mailto:rdove@cov.com)" , "[ritchie.thomas@squirepb.com](mailto:ritchie.thomas@squirepb.com)"

Cc: 'Arnold Lutzker' , Ben Sternberg , "Nyman, Jessica T." , "Warley, Michael A."

Subject: RE: Multigroup Claimants Response to OSC

Brian,

Pursuant to Section D of the Protective Order, the SDC object to Multigroup Claimants' designation as "Restricted" of Exhibits F, G, and H to Multigroup Claimants' response to the order to show cause, and the portions of Multigroup Claimant response referring to those exhibits.

Exhibit F appears to be an instrument transferring Denise Vernon's interest in Worldwide Subsidy Group, LLC to Alfred Galaz, "[e]ffective January 1, 2017," for consideration of one dollar. There is nothing even arguably confidential about this document. It has already been revealed in multiple public pleadings by Worldwide Subsidy Group and Multigroup Claimants that Denise Vernon was at one time the majority owner of Worldwide Subsidy Group, and Alfred Galaz submitted a public declaration claiming that he obtained a 99% interest in Worldwide Subsidy Group at some time before January 1, 2018. The only new piece of information contained in this document is that the "[e]ffective date" of the transfer is purported to be on January 1, 2017. Moreover, Worldwide Subsidy Group was required by Texas law to file a public information report each year, naming the current members of the LLC. Worldwide Subsidy Group has no legitimate expectation in keeping either its owners or dates of ownership confidential.

Exhibit G appears to be an instrument transferring ownership of Worldwide Subsidy Group from Alfred Galaz and Ruth Galaz to Ryan Galaz "[e]ffective December 31, 2017," for consideration of one dollar. I don't currently know who Ryan Galaz is, but I expect it is safe to assume that he is another relative of Raul Galaz. As with Exhibit F, Worldwide Subsidy Group was required by Texas law to file a public information report disclosing the identities of its members, and it has no legitimate expectation of keeping its ownership secret.

Moreover, according to footnote 1 of Multigroup Claimants' response to the order to show cause, "Alfred Galaz provided his bankruptcy legal counsel all of his relevant papers, including the document attached hereto as Exhibit G. Alfred Galaz speculated that such legal counsel simply misread the document, and identified Ruth Galaz, a co-signatory to the document, as the transferee, not Ryan Galaz." According to this footnote, Ryan Galaz would have been publicly identified in Alfred Galaz's bankruptcy petition as the transferee of Worldwide Subsidy Group but for the fact that Alfred Galaz's counsel "misread" the document. Again, there is no legitimate expectation that either the owner or the date of transfer of Worldwide Subsidy Group would be kept confidential.



[REDACTED]

Exhibit H appears to be an instrument transferring Alfred Galaz's "right, title and interest" in Multigroup Claimants and Spanish Language Producers to Ryan Galaz "[e]ffective January 1, 2018," for consideration of one dollar. The document falsely states that Multigroup Claimants has "no current financial obligations, and no current value," even though Multigroup Claimants claimed to have obligations as an agent for many dozens of copyright claimants, and was currently claiming a right to recover millions of dollars in royalties in multiple Copyright Royalty Board proceedings. Because there are legal requirements to register fictitious business names in most jurisdictions, and because Copyright Royalty Board regulations require claimants to provide the Board with legal names, Multigroup Claimants had no legitimate expectation that Ryan Galaz's identity could be kept secret. Use of a fictitious business name to obscure the identity of the true owner of a business is plainly improper, and has been found to be an indicator of fraud.

Finally, the public interest in public disclosure of each of these documents is clear. The information in each of these exhibits directly conflicts with other information that Worldwide Subsidy Group or Alfred Galaz has made public:

- Exhibit F, purporting to show a transfer of Worldwide Subsidy Group "[e]ffective January 1, 2017," from Denise Vernon to Alfred Galaz conflicts directly with Worldwide Subsidy Group's public information report for 2017, apparently signed by Denise Vernon on September 11, 2017, identifying Denise Vernon as Worldwide Subsidy Group's sole member.
- Exhibit G, purporting to show a transfer of Worldwide Subsidy Group "[e]ffective December 31, 2017," from Alfred Galaz and Ruth Galaz to Ryan Galaz conflicts with Worldwide Subsidy Group's public information report for 2017, discussed above, and with Worldwide Subsidy Group's public information report for 2018, apparently signed by Alfred Galaz on June 23, 2018, identifying Alfred Galaz and Ruth Galaz each as a "Partner" in Worldwide Subsidy Group. As noted, Exhibit G also conflicts with Alfred Galaz's public bankruptcy filing, in which he claims that he transferred "Worldwide Subsidy" to Ruth Galaz on January 1, 2018.
- Exhibit H, purporting to show a transfer of Multigroup Claimants and Spanish Language Producers "[e]ffective January 1, 2018," from Alfred Galaz to Ryan Galaz conflicts with Alfred Galaz's declaration, filed with Multigroup Claimants' opposition on January 9, 2020, in which Alfred Galaz claimed, "even if I had been required to identify 'Multigroup Claimants' in my bankruptcy petition, I had already transferred all interests held by it into Worldwide Subsidy Group, LLC, which adopted 'Multigroup Claimants' as an assumed name. At the time of such transfer, I owned 99% of Worldwide Subsidy Group, LLC, and effective January 1, 2018 transferred all of my interest in that entity." Contrary to Alfred Galaz's public testimony, Exhibit H purports to show that Alfred Galaz transferred Multigroup Claimants to Ryan Galaz, not to Worldwide Subsidy Group, and that he transferred Multigroup Claimants after he had already transferred his 99% interest in Worldwide Subsidy Group.

Multigroup Claimants / Worldwide Subsidy Group / the Galaz family cannot permissibly use the Judges' protective order to create one narrative in public (whether true or false) while advancing a different and contradictory narrative in restricted filings (whether true or false). There is absolutely no showing in support of your conclusory declaration that the disclosure of any of this information "could damage Multigroup Claimants and its principals" other than in the obvious respect that they might help to expose numerous false statements by Multigroup Claimants and its principals. The public has a right to access (see 37 C.F.R. § 302.1(a)), we have a right to a public hearing, and the Copyright Royalty Board has a right not allow its procedures to be misused to mislead whomever it is that "Multigroup Claimants" is trying to mislead.

Would you please withdraw your designation of the documents as Restricted under the Protective Order?

Matt

Matthew J. MacLean | Partner  
Pillsbury Winthrop Shaw Pittman LLP  
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t +1.202.663.8183  
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-----Original Message-----

[REDACTED]

From: Brian D. Boydston, Esq. <[brianb@ix.netcom.com](mailto:brianb@ix.netcom.com)>  
Sent: Friday, February 28, 2020 7:12 PM  
To: [jstewart@crowell.com](mailto:jstewart@crowell.com); [lh@msk.com](mailto:lh@msk.com); [victor.cosentino@larsongaston.com](mailto:victor.cosentino@larsongaston.com); [john@beiterlaw.com](mailto:john@beiterlaw.com); [rdove@cov.com](mailto:rdove@cov.com); [ritchie.thomas@squirepb.com](mailto:ritchie.thomas@squirepb.com); MacLean, Matthew J. <[matthew.maclea@pillsburylaw.com](mailto:matthew.maclea@pillsburylaw.com)>  
Subject: Multigroup Claimants Response to OSC

\* EXTERNAL EMAIL \*

Dear Counsel attached are the papers filed today by Multigroup Claimants in response to the CRB's OSC.

Brian Boydston

The contents of this message, together with any attachments, are intended only for the use of the individual or entity to which they are addressed and may contain information that is legally privileged, confidential and exempt from disclosure. If you are not the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this message, or any attachment, is strictly prohibited. If you have received this message in error, please notify the original sender or the Pillsbury Winthrop Shaw Pittman Service Desk at Tel: 800-477-0770, Option 1, immediately by telephone and delete this message, along with any attachments, from your computer. Nothing in this message may be construed as a digital or electronic signature of any employee of Pillsbury Winthrop Shaw Pittman. Thank you.

# Proof of Delivery

I hereby certify that on Monday, June 29, 2020, I provided a true and correct copy of the Settling Devotional Claimants' Motion to De-Designate Restricted Materials (De-Designated) to the following:

National Association of Broadcasters (NAB) aka CTV, represented by John Stewart, served via ESERVICE at [jstewart@crowell.com](mailto:jstewart@crowell.com)

Joint Sports Claimants (JSC), represented by Michael E Kientzle, served via ESERVICE at [michael.kientzle@apks.com](mailto:michael.kientzle@apks.com)

Public Television Claimants (PTC), represented by Dustin Cho, served via ESERVICE at [dcho@cov.com](mailto:dcho@cov.com)

MPA-Represented Program Suppliers (MPA), represented by Gregory O Olaniran, served via ESERVICE at [goo@msk.com](mailto:goo@msk.com)

Canadian Claimants Group, represented by Lawrence K Satterfield, served via ESERVICE at [lksatterfield@satterfield-pllc.com](mailto:lksatterfield@satterfield-pllc.com)

Multigroup Claimants (MGC), represented by Brian D Boydston, served via ESERVICE at [brianb@ix.netcom.com](mailto:brianb@ix.netcom.com)

Signed: /s/ Matthew J MacLean